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Reply to New York Office

January 26, 2018

Magistrate Judge Sarah Netburn
United States District Court, Southern
District of New York
500 Pearl Street
New York, NY 10007

Re: *Santiago v. ID&T/SFX Mysteryland, LLC, et al.*
1:17-cv-00101-PAE
Our File No. 10310-362

Magistrate Judge Netburn:

This office represents defendant ID&T/SFX Mysteryland in the above mentioned matter.

We have been made aware that co-defendant Strike Force Protective Services, Inc., which was served but has not yet appeared in this matter, has filed for bankruptcy protection in the United States Bankruptcy Court for the District of New Jersey.

Attached hereto is copy of the bankruptcy petition for the Court's attention.

Respectfully submitted,

/s/

Michelle L. Bochner

cc: All parties via ECF

{03094618.DOCX/ }

1065 Avenue of the Americas ■ Suite 800 ■ New York, New York 10018
212-488-1598 ■ 212-564-0203 Facsimile

114 Old Country Road ■ Suite 300 ■ Mineola, New York 11501
516-620-1700 ■ 516-746-0833 Facsimile

170 Hamilton Avenue ■ Suite 210 ■ White Plains, New York 10601
914-290-6430 ■ 914-560-2245 Facsimile

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Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF NEW JERSEY

Case number (if known)

Chapter 11☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

4/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Strike Force Protective Services, Inc.
2. All other names debtor used in the last 8 years
Include any assumed names, trade names and doing business as names
3. Debtor's federal Employer Identification Number (EIN) 11-3404099
4. Debtor's address

Principal place of business <u>51 Progress Street</u> <u>Union, NJ 07083</u> Number, Street, City, State & ZIP Code <u>Union</u> County	Mailing address, if different from principal place of business P.O. Box, Number, Street, City, State & ZIP Code Location of principal assets, if different from principal place of business Number, Street, City, State & ZIP Code
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5. Debtor's website (URL) www.strikeforceprotectiveservices.com
6. Type of debtor
 - ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
 - ☐ Partnership (excluding LLP)
 - ☐ Other. Specify: _____

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Debtor Strike Force Protective Services, Inc.
Name

Case number (if known)

7. Describe debtor's business A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.
See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5616

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
- ☐ Chapter 9

☒ Chapter 11. Check all that apply:

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- ☒ No.
- ☐ Yes.

If more than 2 cases, attach a separate list.

District _____	When _____	Case number _____
District _____	When _____	Case number _____

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

- ☐ No
- ☒ Yes.

List all cases. If more than 1, attach a separate list

Debtor <u>See Attachment</u>	Relationship _____
District _____	When _____ Case number, if known _____

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Case 18-10156-JKS Doc 1 Filed 01/03/18 Entered 01/03/18 17:22:06 Desc Main Document Page 3 of 13

Debtor **Strike Force Protective Services, Inc.**

Case number (if known)

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No☐ Yes.

Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard?

☐ It needs to be physically secured or protected from the weather.☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).☐ Other

Where is the property?

Number, Street, City, State & ZIP Code

Is the property insured?

☐ No☐ Yes. Insurance agency

Contact name

Phone

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

☒ 1-49☐ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000

15. Estimated Assets

☒ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

16. Estimated liabilities

☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☒ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

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Debtor **Strike Force Protective Services, Inc.**
Name

Case number (if known)

Request for Relief, Declaration, and Signatures**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2018
MM / DD / YYYY**X /s/ Frederick G. Goldring**

Signature of authorized representative of debtor

Frederick G. Goldring

Printed name

Title President**18. Signature of attorney****X /s/ Stuart Gold**

Signature of attorney for debtor

Date January 3, 2018

MM / DD / YYYY

Stuart Gold

Printed name

Mandelbaum Salsburg P.C.

Firm name

3 Becker Farm Road**Roseland, NJ 07068**

Number, Street, City, State & ZIP Code

Contact phone 9737364600Email address sgold@lawfirm.ms009511986

Bar number and State

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Case 18-10156-JKS Doc 1 Filed 01/03/18 Entered 01/03/18 17:22:06 Desc Main Document Page 5 of 13

Debtor Strike Force Protective Services, Inc.
Name

Case number (if known) _____

Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF NEW JERSEY

Case number (if known) _____

Chapter 11☐ Check if this an amended filing**FORM 201. VOLUNTARY PETITION****Pending Bankruptcy Cases Attachment**

Debtor	<u>Initial Protective Services, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u>	When	<u>1/03/18</u>
		Case number, if known	<u>TBA</u>
Debtor	<u>Strike Force of New Jersey, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u>	When	<u>1/03/18</u>
		Case number, if known	<u>TBA</u>
Debtor	<u>Summit Staffing Solutions, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u>	When	<u>1/03/18</u>
		Case number, if known	<u>TBA</u>
Debtor	<u>Summit Staffing Solutions, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u>	When	<u>1/03/18</u>
		Case number, if known	<u>TBA</u>
Debtor	<u>Ultimate Services, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u>	When	<u>1/03/18</u>
		Case number, if known	<u>TBA</u>
Debtor	<u>USI landscape and Design, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u>	When	<u>1/03/18</u>
		Case number, if known	<u>TBA</u>
Debtor	<u>USI Services Group, Inc.</u>	Relationship to you	<u>Parent</u>
District	<u>New Jersey</u>	When	<u>1/03/18</u>
		Case number, if known	<u>TBA</u>

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Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF NEW JERSEY

Case number (if known)

Chapter 11

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

4/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Strike Force of New Jersey, Inc.

2. All other names debtor used in the last 8 years

Include any assumed names, trade names and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 22-3707119

4. Debtor's address Principal place of business

51 Progress Street
Union, NJ 07083

Number, Street, City, State & ZIP Code

Union
County

Mailing address, if different from principal place of business

P.O. Box, Number, Street, City, State & ZIP Code

Location of principal assets, if different from principal place of business

Number, Street, City, State & ZIP Code

5. Debtor's website (URL)

6. Type of debtor

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))☐ Partnership (excluding LLP)☐ Other. Specify:

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Case 18-10158-JKS Doc 1 Filed 01/03/18 Entered 01/03/18 17:26:22 Desc Main Document Page 2 of 18

Debtor Strike Force of New Jersey, Inc.
Name

Case number (if known) _____

7. Describe debtor's business A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.
See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5616

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
- ☐ Chapter 9

☒ Chapter 11. Check all that apply.

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11 (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- ☒ No.
- ☐ Yes.

If more than 2 cases, attach a separate list.

District _____	When _____	Case number _____
District _____	When _____	Case number _____

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

- ☐ No
- ☒ Yes.

List all cases. If more than 1, attach a separate list

Debtor <u>See Attachment</u>	Relationship _____
District _____	When _____ Case number, if known _____

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Debtor Strike Force of New Jersey, Inc.
Name

Case number (if known)

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No☐ Yes.

Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
What is the hazard? _____

☐ It needs to be physically secured or protected from the weather.

☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐ Other _____

Where is the property? _____

Number, Street, City, State & ZIP Code

Is the property insured?

☐ No☐ Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

☐ 1-49☒ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000

15. Estimated Assets

☒ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

16. Estimated liabilities

☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☒ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

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Debtor Strike Force of New Jersey, Inc.
Name

Case number (if known) _____

Request for Relief, Declaration, and Signatures**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2018
MM / DD / YYYY**X** /s/ Frederick G. Goldring
Signature of authorized representative of debtorFrederick G. Goldring
Printed nameTitle President**18. Signature of attorney****X** /s/ Stuart Gold
Signature of attorney for debtorDate January 3, 2018
MM / DD / YYYYStuart Gold
Printed nameMandelbaum Salsburg P.C.
Firm name3 Becker Farm Road
Roseland, NJ 07068
Number, Street, City, State & ZIP CodeContact phone 9737364600Email address sgold@lawfirm.ms009511986
Bar number and State

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Debtor Strike Force of New Jersey, Inc.
Name

Case number (if known) _____

Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF NEW JERSEY

Case number (if known) _____ Chapter 11☐ Check if this an amended filing

FORM 201. VOLUNTARY PETITION

Pending Bankruptcy Cases Attachment

Debtor	<u>Initial Protective Services, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u> When <u>1/03/18</u>	Case number, if known	<u>TBA</u>
Debtor	<u>Strike Force Protective Services, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u> When <u>1/03/18</u>	Case number, if known	<u>TBA</u>
Debtor	<u>Summit Staffing Solutions, Inc</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u> When <u>1/03/18</u>	Case number, if known	<u>TBA</u>
Debtor	<u>Ultimate Services, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u> When <u>1/03/18</u>	Case number, if known	<u>TBA</u>
Debtor	<u>USI Landscape and Design, Inc.</u>	Relationship to you	<u>Affiliate</u>
District	<u>New Jersey</u> When <u>1/03/18</u>	Case number, if known	<u>TBA</u>
Debtor	<u>USI Services Group, Inc.</u>	Relationship to you	<u>Parent</u>
District	<u>New Jersey</u> When <u>1/03/18</u>	Case number, if known	<u>TBA</u>